

**UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

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<b>JANICE SHORTER, PERSONAL :</b>		
<b>REPRESENTATIVE AND LEGAL :</b>		<b>NO. 3:16-CV-01973</b>
<b>GUARDIAN FOR :</b>		
<b>DONSHAY SAYLES, :</b>		
<b>Plaintiff :</b>		
		<b>(Judge Mannion)</b>
<b>v. :</b>		<b>(Magistrate Judge Arbuckle)</b>
<b>CHARLES E. SAMUELS, JR., :</b>		
<b>ET AL. :</b>		
<b>Defendants :</b>		

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**MOTION FOR LEAVE TO FILE UNDER SEAL**

Comes now the Plaintiff, by and through counsel, and respectfully moves the Court for permission to file Exhibit A to Plaintiff's Motion Under Rule 30(a)(2) (B) to take the deposition of federal inmate Joseph Wing (ECF No. 225), under seal, as it falls under the Protective Order in this case (ECF Nos. 44 and 148), and that said document is to remain sealed pending further Order of Court.

A proposed order is attached hereto.

Date: April 28, 2023

Respectfully submitted,

/s/ Jennifer J. Tobin

Jennifer J. Tobin, PA Bar 202047

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### **CERTIFICATE OF SERVICE**

I certify that on this date, a true and correct copy of the foregoing along with all attachments, was electronically filed and is available for viewing and downloading from the Court's ECF system. In addition, a copy was served via the Court's ECF notification system on the following:

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Date: April 28, 2023

/s/ Jennifer J. Tobin  
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